

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**(01) CHANDELLE EUGENE MARTEEN,**  
[DOB: 06/19/1984]

**(02) JASON LEE PATILLO,**  
[DOB: 04/10/1974]

and

**(03) CANDACE ANNE COOK**  
[DOB: 03/24/1982]

Defendants.

**Defendants/Counts**

**C. Marteen: 1-14, 16-22**

**J. Patillo: 1**

**C. Cook: 1,15**

No. 2:23-cr-4035-RK

**COUNT 1**

18 U.S.C. § 1349

NMT 30 Years Imprisonment

NMT \$1,000,000 Fine

NMT 5 Years Supervised Release

Class B Felony

**COUNTS 2-10**

18 U.S.C. § 1344

NMT 30 Years Imprisonment

NMT \$1,000,000 Fine

NMT 5 Years Supervised Release

Class B Felony

**COUNTS 11-15**

18 U.S.C. § 1708

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

**COUNTS 16-22**

18 U.S.C. § 1028A

2 Years Imprisonment

Consecutive to other Counts

NMT 1 Year Supervised Release

Class E Felony

**FORFEITURE ALLEGATION**

18 U.S.C. §§ 981(a)(1)(A) and (C) and

982(a)(1) and (2)(A)

28 U.S.C. § 2461(c)

\$100 Special Assessment (Each Count)

Mandatory Restitution (Each Count)

## **INDICTMENT**

### **THE GRAND JURY CHARGES THAT:**

At all times relevant to this Indictment:

#### **Introductory Allegations**

1. The defendant, **CHANDELLE EUGENE MARTEEN** resided in Columbia, Missouri, in the Western District of Missouri.
2. The defendant, **JASON LEE PATILLO**, resided in Columbia, Missouri, in the Western District of Missouri.
3. The defendant, **CANDACE ANNE COOK**, resided in Columbia, Missouri, in the Western District of Missouri.
4. Simmons Bank, Commerce Bank, and BTC Bank, the deposits of which are insured by the Federal Deposit Insurance Corporation, and Tiger Community Credit Union, the accounts of which are insured by the National Credit Union Administration, were financial institutions within the meaning of Title 18, United States Code, Sections 20 and 1344.

#### **COUNT 1**

(Conspiracy to Commit Bank Fraud)

18 U.S.C. § 1349

5. Paragraphs 1 through 4 of this Indictment are realleged and reincorporated as if fully set forth herein.
6. Beginning no later than in or around July 2021, and continuing through at least in or around March 2023, in the Western District of Missouri and elsewhere, the defendants, **(01) CHANDELLE EUGENE MARTEEN, (02) JASON LEE PATILLO, and (03) CANDACE ANN COOK**, knowingly and willfully combined, conspired, and agreed with each other, and with others known and unknown to the Grand Jury, to commit the following offense, that is, devised

and intended to devise a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property owned by, or under the custody and control of a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, that is bank fraud, contrary to the provisions of Title 18, United States Code, Section 1344(2).

**Manner and Means**

7. It was part of the conspiracy and scheme to defraud that **MARTEEN, COOK**, and others, stole mail and caused the theft of mail from USPS collection boxes and residential mailboxes in and around Columbia, Missouri, within the Western District of Missouri.

8. In furtherance of the conspiracy and scheme to defraud, **MARTEEN, COOK**, and others obtained and caused to be obtained personal and business checks that had been mailed and placed in USPS collection boxes and residential mailboxes in and around Columbia, Missouri.

9. In furtherance of the conspiracy and scheme to defraud **MARTEEN, COOK**, and others forged and caused to be forged the name of the payee of the checks, the amount payable of the checks, and other terms of the checks.

10. In furtherance of the conspiracy and scheme to defraud, **MARTEEN**, and others, obtained and caused to be obtained personal identification documents belonging to others to use to cash or deposit stolen and fraudulent checks into banks or other financial institutions.

11. In furtherance of the conspiracy and scheme to defraud **MARTEEN** opened and caused to be opened accounts at banks and other financial institutions using stolen personal identification documents, deposited stolen and fraudulent checks, and withdrew moneys from the fraudulent account.

12. In furtherance of the conspiracy and scheme to defraud, **PATILLO** opened a bank account at **MARTEEN's** instruction and gave **MARTEEN** the debit card, the Personal

Identification Number (“PIN”), and other account information, enabling **MARTEEN** to deposit stolen, fraudulent checks, and withdraw moneys from the account using cash withdrawals at ATMs and electronic transfers.

13. All in violation of Title 18, United States Code, Section 1349.

**Execution of the Scheme**

**COUNTS 2-10**  
(Bank Fraud)  
18 U.S.C. § 1344(2)

14. On or about the dates set forth in each individual count, in the Western District of Missouri, the defendant, **(01) CHANDELLE EUGENE MARTEEN**, executed and attempted to execute the above-described scheme and artifice to defraud, as follows:

<b>COUNT</b>	<b>DATE</b>	<b>ACT OR ATTEMPTED ACT OF EXECUTION</b>
2	October 5, 2022	Attempted to pass a stolen and altered check, drawn on Commerce Bank account #xxxxxx1440 in the name of Victim T.S. and payable to Individual Q.A. in the amount of \$800.00, at a Commerce Bank branch in Columbia, Missouri
3	December 19, 2022	Deposited a stolen and altered check, drawn on Simmons Bank account #0006042 in the name of Victim K.W. and payable to Individual S.P. in the amount of approximately \$5,000, into Simmons account #000009045, at a Simmons Bank, branch in Columbia, Missouri.
4	December 27, 2022	Attempted to cash a stolen and altered check drawn on BTC Bank account #005468 in the name of Victim L.P. and payable to Individual J.W. in the amount of \$600.00, at BTC Bank in Columbia, Missouri
5	December 28, 2022	Deposited a fraudulent check, drawn on Wells Fargo Bank account #xxxxxxxxx4176 in the name of Victim T.W. and payable to Individual J.A. in the amount of approximately \$5,390.00, into member account #xxxxxxx3988 at the Tigers Community Credit Union branch in Columbia, Missouri.
6	December 29, 2022	Deposited a fraudulent check, drawn on US Bank account #xxxxxxxxx2534 in the name of Victim H.B.R.W. and payable to Individual S.P. in the amount of approximately

		\$842.80, into Tigers Community Credit Union member account #xxxxxxx3988 via mobile deposit.
7	December 29, 2022	Deposited a stolen and altered check, drawn on Wings Financial Credit Union account #xxxxxxx2565 in the name of Victim D.M. and S.M. and payable to Individual S.P. in the amount of approximately \$980.00, into Tigers Community Credit Union member account #xxxxxxx3988 via mobile deposit.
8	January 6, 2023	Deposited a stolen and altered check, drawn on Nodaway Valley Bank account #xxx0507 in the name of Victim L.B. and C.H. and payable to Individual S.P. in the amount of approximately \$1,000.00, into Tigers Community Credit Union member account #xxxxxxx3988 via mobile deposit.
9	January 7, 2023	Deposited a stolen United States Treasury Check payable to Business N.R.N.C., in care of victim J.L., in the amount of approximately \$8,210.71, into Tigers Community Credit Union member account #xxxxxxx3988 via mobile deposit.
10	January 6, 2023	Deposited a stolen United States Treasury Check payable to Business N.R.N.C., in care of victim J.L., in the amount of approximately \$13,059.29, into account #xxxxxx2642 at a Simmons Bank branch in Columbia, Missouri.

15. All in violation of Title 18, United States Code, Sections 1344(2) and 2.

**COUNT 11**  
**Mail Theft**  
(18 U.S.C. § 1708)

16. On or about November 21, 2022, in the Western District of Missouri, the defendant, **(01) CHANDELLE EUGENE MARTEEN**, did steal, take, and abstract, and attempted to steal, take, and abstract, mail from and out of an authorized depository for mail matter, namely, a USPS collection box outside the U.S. Post Office at 511 East Walnut Street, Columbia, Missouri, in violation of Title 18, United States Code, Section 1708.

**COUNT 12**  
Mail Theft  
(18 U.S.C. § 1708)

17. On or about January 30, 2023, in the Western District of Missouri, the defendant, **(01) CHANDELLE EUGENE MARTEEN**, did steal, take, and abstract, and attempted to steal, take, and abstract, mail from and out of an authorized depository for mail matter, namely, a mail receptacle located at El Safari LLC, Agave Mexican Restaurant, 901 Safari Dr., Suite 101, Columbia, Missouri, in violation of Title 18, United States Code, Section 1708.

**COUNT 13**  
Possession of Stolen Mail Matter  
(18 U.S.C. § 1708)

18. On or about October 5, 2022, in the Western District of Missouri, the defendant, **(01) CHANDELLE EUGENE MARTEEN**, did unlawfully have in his possession an article of mail, namely numerous checks and documents, which articles of mail had been stolen, taken, embezzled, and abstracted from a mail receptacle, an authorized depository for mail matter, knowing said articles of mail to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

**COUNT 14**  
Possession of Stolen Mail Matter  
(18 U.S.C. § 1708)

19. On or about December 29, 2022, in the Western District of Missouri, the defendant, **(01) CHANDELLE EUGENE MARTEEN**, did unlawfully have in his possession an article of mail, namely numerous checks and documents, which articles of mail had been stolen, taken, embezzled, and abstracted from a mail receptacle, an authorized depository for mail matter, knowing said articles of mail to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

**COUNT 15**  
Possession of Stolen Mail Matter  
(18 U.S.C. § 1708)

20. On or about March 14, 2023, in the Western District of Missouri, the defendant, **(02) CANDACE ANNE COOK**, did unlawfully have in her possession articles of mail, namely numerous checks and documents, which articles of mail had been stolen, taken, embezzled, and abstracted from a mail receptacle, an authorized depository for mail matter, knowing said articles of mail to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

**COUNTS 16-22**  
(Aggravated Identity Theft)  
(18 U.S.C. § 1028A)

21. Paragraphs 1 through 4 and 7 through 12 are realleged and incorporated by reference as if fully set forth herein.

22. On or about the dates set forth below, in the Western District of Missouri, in each individual count, the defendant, **(01) CHANDELLE EUGENE MARTEEN**, knowingly possessed and used, without lawful authority, a means of identification of another person, described below for each count, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, bank fraud, in violation of Title 18, United States Code, Section 1344(2), knowing that the means of identification belonged to another actual person, each means of identification constituting a separate count:

COUNT	DATE	SUMMARY
16	December 19, 2022	The driver's license and purported signature of Victim S.P., used to open a fraudulent bank account at Simmons Bank.
17	December 27, 2022	The identification card of Victim J.W. and the name and purported signature of Victim J.W., located on a stolen and altered check that <b>MARTEEN</b> attempted to pass at the BTC Bank on the account of Individual L.P.

18	December 28, 2022	The driver's license and purported signature of Victim S.P., used to open a fraudulent bank account at Tiger Community Credit Union.
19	December 28, 2022	The name and purported signature of Victim S.P., located on a fraudulent check that <b>MARTEEN</b> deposited and caused to be deposited into Tigers Community Credit Union member account #xxxxxxx3988.
20	December 29, 2022	The name and purported signature of Victim S.P., located on a fraudulent check that <b>MARTEEN</b> deposited and caused to be deposited into Tigers Community Credit Union member account #xxxxxxx3988.
21	December 29, 2022	The name and purported signature of Victim S.P., located on a fraudulent check that <b>MARTEEN</b> deposited and caused to be deposited into Tigers Community Credit Union member account #xxxxxxx3988.
22	January 6, 2023	The name and purported signature of Victim S.P., located on a fraudulent check that <b>MARTEEN</b> deposited and caused to be deposited into Tigers Community Credit Union member account #xxxxxxx3988.

23. All in violation of Title 18, United States Code, Section 1028A(a)(1).

### **FORFEITURE ALLEGATION**

24. The factual allegations of this Indictment are re-alleged and incorporated as though full set forth herein for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(A) and (C) and Title 28, United States Code, Section 2461, the defendant, **(01) CHANDELLE EUGENE MARTEEN**, as to the Indictment, shall forfeit to the United States all property, real or personal, constituting, involved in, and derived from any proceeds the defendant obtained directly and indirectly as a result of the violations incorporated by reference in this Forfeiture Allegation. Including but not limited to the following:

### **Money Judgment**

25. A money judgment representing proceeds obtained by the defendant, in that, the



sum in aggregate constitutes and derived from proceeds traceable to the offenses set forth in the Indictment.

**Substitute Assets**

26. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

**A TRUE BILL.**

*/s/ Donna Richardson*  
**FOREPERSON OF THE GRAND JURY**

*/s/ Jim Lynn*  
**JIM LYNN**  
Assistant United States Attorney  
Missouri Bar No. 32140

Dated: \_\_\_\_\_